

REMARKS

Applicants express appreciation to the Examiner for the courtesy of an interview granted to applicants' representative Marc A. Berger (Reg. No. 44,029). The interview was held by telephone on Wednesday, September 7, 2005.

Applicants have carefully studied the outstanding Office Action and the subsequent Advisory Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicants have canceled claims 154 – 156 and 168 – 170, and amended claims 1, 26, 51, 72, 115, 124, 141 - 143, 157 and 171 – 175. Claims 1 – 12, 14 - 18, 22 – 37, 39 - 43, 47 – 58, 60 - 63, 67 – 79, 81 – 84, 88 – 92, 115 – 132, 141, 142 – 153, 157 – 167 and 171 -175 are presented for examination.

On page 4 of the Office Action, in Paragraphs I and II, the Examiner has rejected claims 141, 142 and 174 under 35 U.S.C. §102(e) as being fully anticipated by Bloomberg, US Patent No. 5,761,686 (“Bloomberg”).

On pages 5 – 21 of the Office Action, in Paragraphs III and IV, the Examiner has rejected claims 1 – 3, 5 – 12, 14 – 18, 22 – 28, 30 – 37, 39 – 43, 47 – 53, 55 – 58, 60 – 63, 67 – 74, 76 – 79, 81 – 84, 88 – 92, 143 – 172 and 175 under 35 U.S.C. §103(a) as being unpatentable over Howard et al., US Patent Application Publication 2001/0042045 (“Howard”) and further in view of Bloomberg. Applicants have canceled claims 154 - 156 and 168 - 170 without acquiescence to the Examiner's reasons for rejection and respectfully submit that rejection of those claims is thus rendered moot.

On page 21 of the Office Action, in Paragraph V, the Examiner has rejected claims 4, 29, 54 and 75 under 35 U.S.C. §103(a) as being unpatentable over Howard and further in view of the definition of XML.

On pages 21 – 23 of the Office Action, in Paragraph VI, the Examiner has rejected claims 115 – 117, 121, 124 – 126 and 130 under 35 U.S.C. §103(a) as being unpatentable over Bloomberg.

On pages 23 – 26 of the Office Action, in Paragraph VII, the Examiner has rejected claims 118 – 120, 122, 123, 127 – 129, 131 and 132 under 35 U.S.C. §103(a) as being unpatentable over Bloomberg and further in view of Howard.

Response to Arguments

Regarding the combination of Howard and Bloomberg, applicants respectfully submit that it is not at all obvious to combine these

teachings, and that it is only a result of hindsight that the Examiner suggests the alleged combination. Applicants find no motivation for combining the teachings of Howard and Bloomberg, other than possibly gleaned from the present disclosure. Indeed, these teachings relate to two different applications. Howard relates to copy protection of content using data encryption (Howard / paragraphs [0046]; FIGS. 4C and 5B), and Bloomberg relates to embedding messages within iconic images, similar to the way that messages are embedded within bar codes (Bloomberg / col. 4, lines 23 – 52). Bloomberg does not relate to copy protection or more generally to security, and it would be a stretch of the imagination to apply the teachings of Bloomberg to copy protection.

On pages 2 - 4 of the Office Action, the Examiner has responded to applicants' previous arguments distinguishing the present invention over Howard and Bloomberg. The Examiner's position is that the rectangular blocks of Bloomberg are analogous to the encrypted text of the present invention, and that Bloomberg teaches determining a layout for the rectangular blocks based on the decrypted text, namely the original text.

On pages 6 and 22 of the Office Action, the Examiner has indicated, with reference to Bloomberg, that "*the decrypted text is the same information as the original text*". Applicants respectfully disagree. The decrypted text in Bloomberg is an arbitrary message, that need bear no relationship to the original text (Bloomberg / col. 4, lines 43 – 53).

Referring to independent method claim 1 and corresponding independent claim 171 for a computer readable medium and following the Examiner's analogy, the page with the original text corresponds to input text image 10 of Bloomberg's FIG. 2; and the modified page with the portion of encrypted text, corresponds to iconic image 20 of Bloomberg's FIG. 2. The layout of the rectangular blocks of Bloomberg is determined at step 240 or step 270 of Bloomberg's FIG. 1, and is described at col. 12, line 40 – col. 13, lines 21 and in FIGS. 11 – 16 of Bloomberg.

It is thus clear that Bloomberg's layout step is performed as part of the generation of the iconic image, and not as part of the rendering of the iconic image. In fact, the rendering of Bloomberg's iconic image requires no special processing at all, and in particular no layout determination, as is clear in Bloomberg's FIGS. 5 – 7 in which the iconic image is simply rendered "as is."

In the Advisory Action of October 5, 2005, the Examiner has indicated that the rendering of Bloomberg's iconic image does require special processing, as described throughout cols. 17 – 25 of Bloomberg. Applicants respectfully submit that cols. 17 – 25 of Bloomberg describe decoding the iconic image, but not rendering the iconic image. "Rendering" refers generally to processing the iconic image for display, similar to processing a bar code for

display; and “decoding” generally refers to extracting information (a message) from the iconic image, similar to extracting information from a bar code.

Also in the advisory Action of October 5, 2005, the Examiner has indicated that the layout processing of Bloomberg must be done in order to eventually display the message. Applicants submit that extracting and displaying the message do not constitute “*controlling the display layout for the modified page*” (i.e., the iconic image), as recited in claim 1.

In distinction to Bloomberg, the present invention performs layout determination as part of the rendering of the modified page. The present invention does not render the modified page “as is”, but instead renders it as a decrypted page. As such, Bloomberg’s layout processing is performed at the time of generating the iconic image and not at the time of rendering the iconic image, whereas the present invention performs layout processing at the time of rendering the modified page (which corresponds to Bloomberg’s iconic image) and not at the time of generating the modified page. This is clear in claim 1 since the limitation of “*controlling a display layout*” is part of the overall limitation of “*rendering*”. Pictorially, referring to FIG. 7 of the present invention, Bloomberg performs layout processing in what corresponds to the top left portion of FIG. 7, namely, while generating the encrypted content; whereas the present invention performs layout processing in the bottom right portion of FIG. 7, namely, while rendering the encrypted content.

The same argument applies to independent method claim 51 and corresponding independent claim 172 for a computer readable medium, in which the limitation of controlling a page layout is also part of the overall limitation of rendering the page.

In order to further clarify these distinctions, applicants have amended the language of independent claims 1, 51, 171 and 172 to include additional limitations of:

“*intervening with at least one function that controls page display layouts*”, and

“*decrypting the portion of encrypted text prior to displaying the page*”.

Applicants note that Bloomberg and Howard do not describe intervening with functions that control page display layouts. Although the Examiner, in addressing the limitation of patched operating system functions for outputting content, for rejecting (i) dependent claims 16, 41 61 and 82 on page 11 of the Office Action, (ii) dependent claims 24, 48, 68 and 89 on page 14 of the Office Action, (iii) dependent claims 118 and 127 on page 24 of the Office Action, and (iv) dependent claims 122 and 131 on page 26 of the Office Action, has cited Howard, paragraphs [0088], [0089] and [0093] as teaching “using the

operating system in order to hide contents” and teaching “using the client’s computer for outputting the text”; applicants submit that this is different than “patching”, which is defined in the current specification at paragraphs [0084] – [0086], as “intervening with a function call”.

Similarly, although the Examiner, in addressing the limitation of a Microsoft Windows TextOut function and a Microsoft Windows GetTextExtent function, for rejecting (i) dependent claims 17, 42, 62 and 83 on page 12 of the Office Action, (ii) dependent claims 25, 50, 70 and 91 on page 14 of the Office Action, (iii) dependent claims 119 and 128 on page 24 of the Office Action, and (iv) dependent claims 123 and 132 on page 26 of the Office Action, has cited Howard as teaching the method/system of using different versions of Microsoft operating systems; applicants submit that an operating system is different than a text output function and a text processing function. The same objection by applicants applies to the Examiner’s citing of Howard as teaching the method/system of using different versions of Macintosh operating systems, for rejecting (i) dependent claims 18, 43, 63 and 84 on page 12 of the Office Action, and (ii) dependent claims 120 and 129 on page 25 of the Office Action.

Similarly, regarding independent system claims 26 and 72, in distinction to Bloomberg, the page formatter of the present invention is part of the overall page renderer. Pictorially, referring to FIG. 6 of the present specification, Bloomberg performs layout processing in what corresponds to the top portion of FIG. 6, namely, while generating the encrypted content; whereas the present invention performs layout processing in the bottom portion of FIG. 6, namely, while rendering the encrypted content.

In order to further clarify these distinctions, applicants have amended the language of claims 26 and 72 to include an additional limitation of:

“decrypting the portion of encrypted text prior to displaying the page”.

Regarding independent method claim 115, corresponding independent system claim 124, and corresponding independent claim 173 for a computer readable medium, and following the Examiner’s analogy on page 22 of the Office Action, the “*first portion of text*” corresponds to Bloomberg’s rectangular blocks in iconic image 20 of Bloomberg’s FIG. 2, and the “*second portion of text*” corresponds to Bloomberg’s text image 10 of Bloomberg’s FIG. 2. As such, the limitation of replacing the first portion of text with the second portion of text while rendering the page would correspond to replacing Bloomberg’s rectangular blocks with original text – which is not disclosed in Bloomberg.

In order to further clarify these distinctions, applicants have amended the language of independent claims 115, 124 and 173 to include an additional limitation of:

“intervening with at least one display function that controls page layouts, to base the page layout”

Applicants note that Bloomberg and Howard do not describe intervening with functions that control page display layouts.

Again, as above, the difference between Bloomberg’s disclosure and the claimed invention is that Bloomberg displays the iconic image “as is”, whereas the present invention does not display the encrypted text “as is” (which would correspond to FIG. 1A of the present specification). This is where the analogy of Bloomberg’s iconic image with the encrypted text of the present invention breaks down.

For the same reason, independent method claim 141 and independent system claim 142, which including the limitation of “*replacing a first portion of text with a second portion of text when rendering the page*”, are not described in Bloomberg, since Bloomberg renders the iconic image “as is”.

Applicants note that the Examiner did not address applicants’ arguments regarding independent claims 115, 124, 141 and 142 in the Advisory Action of October 5, 2005.

Regarding independent method claim 143, corresponding independent system claim 157, and corresponding independent claim 175 for a computer readable medium, the Examiner has cited Bloomberg as teaching that “lines of text can be replaced, when the page is rendered into an iconic image”, in rejecting these claims. In order to further clarify the distinction between these claims and Bloomberg, applicant has amended these claims to include the limitation of

“the source file opened by the Internet web browser to render the page contains a third portion of text in place of the first portion of text, the third portion of text being different than the first portion of text”.

Applicants note that Bloomberg does not replace lines of text with iconic images within an Internet web browser. Furthermore, as noted by the Examiner on page 17 of the Office Action, Howard does not disclose the method/system/computer readable medium with stored program code wherein the source file from which the page is rendered contains a third portion of text in place of the first portion of text, the third portion being different than the first portion.

Support for Amended Claims in Original Specification

Claims 1, 51, 171 and 172 have been amended to include the limitation of intervening with functions that control page display layouts. This

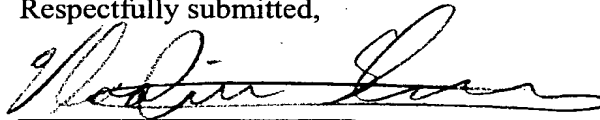
limitation is described in the original specification at paragraph [0076] – [0079] and [0083] – [0087].

Claims 1, 26, 51, 72, 171 and 172 have been amended to include the limitation of decrypting encrypted text prior to displaying the page. This limitation is described in the original specification at FIG. 4, whereby the contents of graphics device 260 are displayed after encrypted content has been decrypted by decoder 440.

Claims 143, 157 and 175 have been amended to include the limitation of an Internet web browser that opens a source file and renders it onto a computer screen. This limitation is described in the original specification at FIGS. 1A, 1B and 1C, and at paragraphs [0044] – [0046].

For the foregoing reasons, applicants respectfully submit that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Vladimir Sherman', written over a horizontal line.

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